

# Managing Compliance Inspections

## Pre-Inspection Activities:

- Develop a standard operating procedure for handling inspections.
- Designate individuals to interface with inspectors (people who have the best working knowledge of your programs and good people skills).
- Designate alternates for all people who interact with inspectors to ensure someone is available to handle unannounced visits.
- With prior notice, prepare by reviewing past inspection reports and Enforcement Vulnerability Analyses.
- Contact the inspector and advise them of security clearance requirements, and if possible, determine the scope of the investigation.
- Prepare an environmental brochure on your installation to showcase positive environmental programs.
- Notify installation commanders and appropriate facility managers, as well as the Bio-Environmental Engineer, Base Security, and Judge Advocate of the pending inspection.
- Have an environmentally knowledgeable individual (outside of the Environmental Flight) look at the installation prior to the inspection – and summarize their views on potential problems.

**NOTE:** Pre-inspection activities are especially important because some inspections occur without any notice.

## Document Review

- Assemble all documents in advance that the inspector needs to review
- Determine in advance which documents are not releasable – such as legal opinions. Consult your installation legal office for guidance.
- Keep all required records in easily accessible files.
- Have a written procedure for handling documents so any record can be quickly located. This should apply to:
  - manifests
  - contingency plans
  - storage records
  - accumulation records
  - waste process logs
  - land disposal restrictions
  - training records
  - compliance notifications
  - service contracts
  - sampling/monitoring results

## Site Entry

- Record the name and mailing address the inspector has for your organization.
- Ascertain the purpose of the inspection - this determines what you show the inspector ( e.g., permit, criminal investigation, particular complaint, overall routine inspection).

## In Briefing

If possible, hold an In Briefing with the inspection team and provide the inspector with general information about the installation (use the environmental brochure). The In Briefing should include:

- The level of installation representation to accompany the inspector(s).
- A discussion on inspection objectives.
- The order of the inspection and schedule.
- Documents the inspector will want to see.
- Identification of sampling requirements.
- Scheduling an out brief with the inspection team.

## Site Inspection

- Ensure escorts have access privileges and flight line badges.
  - Ensure that each inspector is always accompanied by an Air Force installation representative.
  - Have a radio or portable phone to maintain contact with the office to coordinate inspection schedule changes.
  - Answer questions truthfully and openly that you have direct knowledge of, and explain processes, but do not guess at answers or speculate. Do not volunteer information.
  - Take notes on all the questions, responses, and remarks made during the inspection. Compile a list and review what you have recorded with the inspector.
  - Ask the inspector for regulation references for any noted violation. If you have legitimate concerns about the validity of a requirement, express the concern during the inspection and/or out brief, but do not argue or be confrontational in any way.
  - If the inspector notes a violation that can be corrected during the inspection, correct the problem and ask the inspector to include action taken in the inspection report.
  - In addition to taking split samples of any material the inspector samples, keep a log of and take photographs of anything the inspector photographs.
- (NOTE:** Plan ahead to have a camera and film ready for this purpose).
- Obtain the inspector's insights and observations
  - Maintain a cordial and professional relationship with the inspector at all times.

## Out Briefing

- End the inspection visit with a closing out brief.
- Review the list of deficiencies noted during the visit.
- Obtain a receipt for all samples and copies of documents the inspector is taking and get information on how to obtain a copy of the final inspection report.

## Post-Inspection Activities

Write a memo about the visit. Include:

- Inspector's credentials, name, and date, duration, and type of inspection.
- Record of the inspector's preliminary findings or comments.
- Copies of pertinent notes and photographs
- List of documents or other information provided to the inspector.
- Notes on any information gained from the inspector about new or pending regulations or enforcement actions.
- Within 14 days send the inspector a follow up letter on appropriate actions taken; don't wait on possible enforcement action. Initiate contact with the regulator even if you have not received any communication from them. Don't assume "no news is good news".
- Provide Group Commanders a list of noted deficiencies with OPRs and suspenses assigned.
- If a warning letter, notice of violation, or any other enforcement action is received, contact your installation legal office immediately.
- Reply to the regulatory agency by the required response date, identifying the deficiencies already corrected or the proposed schedule for completing corrective measures.
- Installations should take advantage of resources (e.g., MAJCOMs and REOs) who can

quality-assure responses to the regulators, especially on new regulatory programs.

**Copies of all correspondence should also be provided to the Base SJA, BEE, EPC, etc. as well as your MAJCOM and the appropriate AF Regional Environmental Office:**

### ATLANTA

#### AFCEE/CCR-A

**AF Regional Environmental Office – Eastern Region**  
60 Forsyth Street; Suite 8M80  
Atlanta, GA 30303-3416  
**(404) 562-4204 FAX: 4221**  
**Toll Free: (888) 610 - 7419**  
**(Federal Regions 1 - 4)**

### DALLAS

#### AFCEE/CCR-D

**AF Regional Environmental Office – Central Region**  
525 S. Griffin Street; Suite 505  
Dallas, TX 75202-5023  
**(214) 767-4650 FAX: 4661**  
**Toll Free: (888) 610 - 7418**  
**(Federal Regions 5 - 8)**

### SAN FRANCISCO

#### AFCEE/CCR-S

**AF Regional Environmental Office – Western Region**  
333 Market Street; Suite 625  
San Francisco, CA 94105-2196  
**(415) 977-8888 FAX: 8900**  
**Toll Free: (888) 324 - 9254**  
**(Federal Regions 9 - 10)**

# Managing Compliance Inspections



**U.S. AIR FORCE**

## Air Force Center for Environmental Excellence Regional Environmental Offices

**(NOTE:** This brochure is guidance, **NOT** intended as a directive/instruction to supercede DoD, Air Force, or MAJCOM directives/guidance.)

**Revised: Dec 2000**